



The Commonwealth of Massachusetts

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

FIRST SET OF INFORMATION REQUESTS OF THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO BAY STATE GAS COMPANY DTE 05-69

Pursuant to 220 C.M.R. § 1.06 (6)(c), the Department of Telecommunications and Energy ("Department") submits to Bay State Gas Company ("Bay State") its First Set of Information Requests.

Instructions

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of requests, a reference to request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Bay State or any of its witnesses receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks,

articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notation or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve copies of the responses as follows: (a) an original and four (4) copies to Mary L. Cottrell, Secretary of the Department; and (b) one (1) copy to all parties. All written documents (except those for which confidential treatment is sought) should also be submitted to the Department in electronic format using one of the following methods: (1) by e-mail attachment to dte.efiling@state.ma.us and to Shaela.Collins@state.ma.us; or (2) on a 3.5" disk, IBM-compatible format. The text of the e-mail or the disk label must specify: (1) the docket number of the proceeding (D.T.E. 05-69), (2) name of the person or company submitting the filing, and (3) a brief descriptive title of the document (e.g., Response to Information Requests). The electronic filing should also include the name, title and phone number of a person to contact in the event of questions about the filing. Text responses should be created in either Corel WordPerfect, Microsoft Word, or as an Adobe-compatible PDF file. Data or spreadsheet responses should be compatible with Microsoft Excel. Documents submitted in electronic format will be posted on the Department's Website, <http://www.mass.gov/dte>.

Requests

DTE 1-1 Refer to Bay State's petition filed on October 6, 2005 at 2. Please:

- (a) Provide complete and detailed documentation of the cost-effectiveness for each weatherization measure offered as part of Bay State's proposed rebate program.
- (b) Identify which weatherization measures offered as part of Bay State's proposed rebate program were screened for cost-effectiveness in connection with Bay State Gas Company, D.T.E. 04-39, and explain the screening process.
- (c) Identify the weatherization measures offered as part of Bay State's proposed rebate program that are offered through Bay State's "DTE and DOER-approved RCS program." Explain the RCS program and the connection, if any, with cost-effectiveness.

DTE 1-2 Refer to Bay State's petition filed on October 6, 2005 at 3. Please:

- (a) Explain how Bay State concluded that its proposed rebate program would result in ten (10) therms of savings per participating customer.
- (b) Explain what Bay State means by “stipulated/bundled 10 therms of savings.”
- (c) Explain how Bay State estimated that 25,000 customers would participate in the rebate program.

DTE 1-3 Refer to Bay State’s petition filed on October 6, 2005 at 4. Please explain how Bay State’s proposal to fund its rebate program by reallocating funds from its budget for residential energy efficiency programs approved by the Department on September 13, 2004 in Bay State Gas Company, D.T.E. 04-39 (2004) meets the requirements of Section II.F of that Settlement. What percentage of the residential energy efficiency programs does the rebate program constitute?